

Arizona Nevada Tower Corporation

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March 7, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

VIA ECFS

RE: Expression of Interest – Rural Trials, WC Docket No. 10-90

On behalf of Arizona Nevada Tower Corporation, I thank you for the opportunity to submit this Expression of Interest in the FCC funded Broadband Rural Trials.

Background

Arizona Nevada Tower Corporation is a rural telecommunications infrastructure provider in Nevada and the parent corporation for both Westnet Nevada, LLC, a “middle mile” and enterprise broadband services provider, and Atomsplash, LLC a last mile, residential and small business WISP (collectively “ANTC”). Each entity provides its unique service throughout Central and Western Nevada frontier communities. As of the date of this submittal, ANTC owns and operates nearly 500 miles of carrier class high capacity licensed and unlicensed microwave, serving more than 15 rural communities with total network capacity in excess of 200 mbps.

Since 2008 ANTC has partnered with Nevada communities and successfully applied for and been awarded nearly \$10M in federal funding for broadband deployments through the USDA Rural Utilities Service. By October of 2014 ANTC will have successfully implemented and operated three separate Public Computing Centers under the USDA Community Connectivity Grant (“CCG”) Program, (NV1402-A23, NV1402-B23 & NV1402-C23), completed a >800 mile microwave backhaul network capable of delivering broadband capacities in excess of 500 mbps servicing more than 30 rural communities (NV1105-A40) and, through its collaboration with Connect Nevada, ANTC has leveraged the USDA Technical Assistance Grant (“TAG”) (NV1105-B47) to complete models for the implementation of programs, such as the Connect America Fund under this Rural Experiments opportunity in 11 rural counties in Nevada.

At this time, ANTC does not currently have an ETC license; however, if funding were provided, ANTC is fully prepared to meet the requirements set forth by the FCC and the Nevada PUC.

Service Territory and Technology plan:

Because of limited capacity and technical limitations of the broadband services provided by Nevada incumbent providers of last resort, AT&T and Frontier, and the inability or unwillingness to expand their offerings, ANTC currently provides reliable, high capacity, fixed wireless broadband services via both point to point and point to multipoint applications to several hundred customers in proximity to the census tracts identified by the FCC through this program as requiring additional broadband coverage across Nevada’s frontier. By utilizing the proposed FCC funding in conjunction with federal broadband infrastructure projects currently being deployed throughout Nevada by; multiple USDA grant projects

(some of which are held by ANTC and identified above), by the FCC Connect America Mobility program, and by the Department of Commerce ARRA BTOP program, ANTC can quickly enhance and/or extend ubiquitous, unlimited, high capacity broadband services ranging from no less than 4mbps to greater than 20mbps to nearly 18,000 locations and 186 community anchor institutions in 32 unserved and/or underserved rural Nevada census tracts in 11 rural Nevada counties identified by the FCC and depicted in the following chart:

TractID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support	Annual Support per location
32009950100	479	322	\$ 270,526.64	\$ 564.77
32011000100	560	293	\$ 177,809.25	\$ 317.52
32013010500	238	32	\$ 76,253.51	\$ 320.39
32013010600	644	176	\$ 219,868.25	\$ 341.41
32013010701	39	0	\$ 11,597.39	\$ 297.37
32013010702	145	0	\$ 30,746.18	\$ 212.04
32015000300	1210	283	\$ 395,857.11	\$ 327.15
32019960101	203	18	\$ 108,556.11	\$ 534.76
32019960103	34	2	\$ 8,991.02	\$ 264.44
32019960201	316	86	\$ 131,801.83	\$ 417.09
32019960202	608	81	\$ 215,369.22	\$ 354.23
32019960301	58	2	\$ 13,138.57	\$ 226.53
32019960302	23	3	\$ 15,806.75	\$ 687.25
32019960303	55	2	\$ 17,294.81	\$ 314.45
32019960800	1392	231	\$ 556,602.84	\$ 399.86
32019960900	742	71	\$ 260,358.88	\$ 350.89
32021970700	37	10	\$ 6,102.21	\$ 164.92
32021970800	839	148	\$ 312,524.03	\$ 372.50
32023960100	1040	589	\$ 259,816.48	\$ 249.82
32023960200	212	80	\$ 106,197.55	\$ 500.93
32023960300	1123	249	\$ 523,511.04	\$ 466.17
32023960401	1055	82	\$ 357,636.32	\$ 338.99
32023960402	564	9	\$ 123,116.52	\$ 218.29
32023960403	1255	38	\$ 260,448.74	\$ 207.53
32023960404	699	9	\$ 178,841.71	\$ 255.85
32023960405	293	11	\$ 61,103.97	\$ 208.55
32023960406	506	21	\$ 125,320.73	\$ 247.67
32027960100	731	280	\$ 279,435.19	\$ 382.26
32029970200	542	63	\$ 234,088.65	\$ 431.90
32033970100	598	372	\$ 114,680.59	\$ 191.77
32033970200	1215	186	\$ 371,646.94	\$ 305.88
32033970300	441	17	\$ 90,351.78	\$ 204.88

Service Products:

Through its subsidiary, Atomsplash, ANTC currently offers residential services up to 5mbps and small business services up to 12mbps throughout its network. With funding under the Rural Trials program, those offerings can be significantly increased, price reduced, and some partially subsidized for both the existing and all of the proposed tracts. The following chart represents the anticipated service improvements should funding under this program be obtained. Up to 20mbps to the premise is the target for all existing and proposed service areas.

<u>Plan</u>	<u>Combined Speed</u>		<u>Price</u>		<u>With FCC subsidy</u>
	<i>Existing</i>	<i>Proposed</i>	<i>Existing</i>	<i>Proposed</i>	
<u>Residential Plans</u>					
Starter	1.5mbps	4.0mbps	\$ 30.00	\$ 40.00	\$ 19.00
Plus	3.0mbps	6.0mbps	\$ 40.00	\$ 60.00	\$ 39.00
Active	4.5mbps	9.0mbps	\$ 50.00	\$ 90.00	\$ 69.00
Pro	6.0mbps	13.0mbps	\$ 60.00	\$ 130.00	
<i>Ultra (proposed)</i>		20.0mbps		\$ 200.00	
<u>Business Plans</u>					
Base	5.0mbps	5.0mbps	\$ 75.00	\$ 75.00	
Mid	9.0mbps	10.0mbps	\$ 200.00	\$ 175.00	
High	12.0mbps	15.0mbps	\$ 350.00	\$ 275.00	
<i>Enterprise (prop.)</i>		20.0mbps		\$ 350.00	
<u>VOIP Services</u>					
Residential Plans	No services currently. Proposed service is \$19.99 per DID with unlimited CONUS long distance				
Business Plans	Current service is \$34.95 per DID with unlimited CONUS long distance, changes are not anticipated				

Federal, State and Local Stakeholder Support:

As part of the aforementioned USDA TAG and BIP grant programs, ANTC has continually worked closely with county based technology teams in the counties containing the census tracts identified as unserved and underserved by this program. Additionally, ANTC's various USDA CCG programs have created solid relationships with local municipal governments and the related local economic development entities in Mineral, Nye and White Pine Counties, which are all impacted by this program. Further, ANTC has enjoyed the repeated project support of Nevada's elected representatives in the affected districts both on a Federal level (through Congressman Steven Horsford, Senator Harry Reid, and Senator Dean Heller), the State level (through Assemblyman James Oscarson, and Senator Pete Goicoechea), and also at the local level (through various county commissioners throughout the State of Nevada). With regard to this particular opportunity, ANTC has received a specific request from the White Pine County Economic Development Authority to endeavor to secure funding to ensure that ultra-high capacity broadband is delivered, as outlined herein, as soon as possible to all eligible locations in White Pine County. These well established relationship in and around the ANTC service footprint will assist in enhancing Access, Adoption and Use of the enhanced broadband footprint throughout the proposed service areas.

Project Readiness:

Because of the preliminary design and compliance work already completed by ANTC under its USDA RUS TAG, its long standing ties to these communities, and the existing and soon to be completed grant funded infrastructure projects noted herein, ANTC stands ready to deploy this project expeditiously. Within 90 days of funding, initial services up to 20mbps to the premise would begin with comprehensive service to the nearly 18,000 locations and CAI's operational within 12 months of funding.

Funding:

In order to deploy the project successfully, ANTC would require a \$4.5M one-time capital investment for infrastructure deployment and system capacity upgrades. Further, though not required to successfully deploy the project, to stimulate both Adoption and Use, this project would qualify for \$1.5M to \$4.5M per annum in annual subsidy for low income qualified subscribers should the FCC choose to implement such a subsidy to the low income consumer.

Conclusion:

With the support of this FCC program, though collaboration with local stakeholders, leverage of existing, federally funded broadband infrastructure and use of robust fixed wireless technologies, ANTC can deliver ubiquitous high capacity, unlimited broadband to every last location identified in the proposed funded service areas. Scalable 21st century broadband can be a reality in even the most remote frontier communities in the Silver State. Community anchor institutions in these communities can provide cutting edge education, health care and human services on par with their urban counterparts. In every conceivable way, this program will positively enhance the digital landscape in the Nevada frontier forevermore.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Kevin Hayes', is written over the typed name and email address.

Kevin Hayes, President
Kevin.hayes@antower.com